

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

IN RE:	§	C.A. No. 21-10698 (TMD)
WC MET CENTER, LLC,	§	
Debtor.	§	Chapter 11

**NOTICE OF APPEARANCE, REQUEST FOR ALL NOTICES,  
AND DEMAND FOR SERVICES OF PAPERS**

PLEASE TAKE NOTICE that James W. Volberding, attorney for Seth Kretzer, state court appointed Receiver, appears and hereby submits this notice of appearance in the above-captioned proceeding and request notice of all hearings and conferences herein and make a demand for service of all papers herein, including papers and notices pursuant to Bankruptcy Rules 2002, 3017, 9007 and 9010 and §§ 342 and 1009(b) (if applicable) of the Bankruptcy Code. All notices given or required to be given in this case shall be given to and served upon Mr. Volberding at the following address:

**James W. Volberding  
110 N. College Avenue, Suite 1850  
Tyler, TX 75702  
(903) 597-6622 – Telephone  
(713) 929-2019 – Facsimile  
[jamesvolberding@gmail.com](mailto:jamesvolberding@gmail.com)**

And upon Mr. Kretzer at the following address:

**Seth Kretzer  
9119 South Gessner Street, Suite 105  
Houston, TX 77074  
(713) 755-3050 – Telephone  
(713) 929-2019 – Facsimile  
[seth@kretzerfirm.com](mailto:seth@kretzerfirm.com)**

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and sections of the Bankruptcy Code specified above, but also includes, without limitation if applicable, the schedules, statement of

financial affairs, operating reports, any plan of reorganization or disclosure statement, any letter, application, motion, complaint, objection, claim, demand, hearing, petition, pleadings or request, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise filed with or delivered to the Bankruptcy Clerk, Court or Judge (as those terms are defined in Bankruptcy Rule 9001) in connection with and with regard to the above-referenced bankruptcy case and any proceedings related thereto.

Respectfully submitted this 24 day of March 2022,

*/s/ James W. Volberding*

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**JAMES W. VOLBERDING**

State Bar No. 00786313

**KRETZER & VOLBERDING, P.C.**

110 N. College Avenue, Suite 1850

Tyler, Texas 75702

Telephone – (903) 597-6622

Facsimile – (713) 929-2019

**ATTORNEY FOR MR. KRETZER,  
STATE COURT APPOINTED RECEIVER**

*/s/ Seth Kretzer*

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**SETH KRETZER**

State Bar No. 24043764

**KRETZER & VOLBERDING, P.C.**

9119 South Gessner Street, Suite 105

Houston, TX 77074

Telephone – (713) 755-3050

Facsimile – (713) 929-2019

**STATE COURT APPOINTED RECEIVER**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 24 day of March 2022, I sent a true and correct copy of the above and foregoing NOTICE OF APPEARANCE, REQUEST FOR ALL NOTICES, AND DEMAND FOR SERVICES OF PAPERS to the following parties by the following means:

- (1) Parties requesting notice:

Mr. Mark R. Ralston  
Counsel  
mralston@fjrpllc.com

WORLD CLASS CAPITAL GROUP, LLC  
Cogency Global, Inc.  
1601 Elm Street, Suite 4360  
Dallas, TX 75201

WCRE MANAGEMENT, LLC  
Cogency Global, Inc.  
1601 Elm Street, Suite 4360 Dallas, TX 75201

Mr. Jason G. Cohenn (via: [Jason.Cohen@bracewell.com](mailto:Jason.Cohen@bracewell.com))  
Mr. Christopher L. Dodson (via [Chris.Dodson@bracewell.com](mailto:Chris.Dodson@bracewell.com))  
Ms. Caroline W. Ellis (via: [Caroline.W.Ellis@bracewell.com](mailto:Caroline.W.Ellis@bracewell.com))  
711 Louisiana Street  
Suite 2300  
Houston, Texas 77002  
Telephone: (713) 223-2300

- (2) All other creditors and parties in interest (by regular first-class mail):  
NA
- (3) All parties and counsel of record (by e-service or email)
- (4) The United States Trustee (by e-service or email):

Mr. Gary Wright  
Assistant U.S. Trustee

230 Homer Thornberry Judicial Bldg.  
903 San Jacinto Blvd.  
Austin, Texas 78701  
(512) 916-5329

*/s/ James W. Volberding*

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**JAMES W. VOLBERDING**